

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10986 NG

ULYSSES RODRIGUEZ CHARLES,  
Plaintiff,

v.

CITY OF BOSTON, et. al.,  
Defendants.

**JOINT PROPOSED AMENDED SCHEDULING STATEMENT**

The parties, plaintiff Ulysses Rodriguez Charles and the defendants, City of Boston and Stanley Bogdan, jointly submit the following proposed amendment to the pretrial schedule the parties proposed on April 8, 2005:

- (a) Fact discovery will be completed by June 30, 2006.
- (b) Plaintiff will disclose his expert(s) and produce the Rule 26(a)(2)(b) report by July 30, 2006.
- (c) Defendants will disclose their expert(s) and produce the Rule 26(a)(2)(b) report by August 30, 2006.
- (d) The parties will serve motions for summary judgment no later than September 30, 2006.

Wherefore, the parties jointly request that this Honorable Court enter this proposed amended scheduling statement.

[signatures next page]

Respectfully submitted,

DEFENDANTS, STANLEY BOGDAN and  
THE CITY OF BOSTON,  
Merita A. Hopkins  
Corporation Counsel  
By their attorneys:

/s/ Thomas R. Donohue  
Thomas R. Donohue, BBO# 643483  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201  
(617) 635-4039

PLAINTIFF, ULYSSES R. CHARLES  
By his attorneys:

/s/ Mayeti Gametchu [by TRD]  
Mayeti Gametchu, BBO # 647787  
Paragon Law Group  
184 High Street  
Boston, MA 02110  
(617) 399-7950

Dated: November 21, 2005